

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,	*	
	*	
Plaintiff,	*	
	*	
v.	*	CASE NO. 2:06-CV-00116-MEF
	*	
FIVE HUNDRED FORTY-THREE	*	
THOUSAND ONE HUNDRED NINETY	*	
DOLLARS (\$543,190.00 in United States	*	
Currency	*	
Defendant.	*	
and	*	
	*	
ENRIQUE ALCARAZ-BARAJAS,	*	
	*	
Claimant.	*	

MOTION FOR EXPANSION OF TIME TO FILE RESPONSE

Comes now the Claimant Enrique Alcaraz-Barajas, by and through the undersigned attorney, and moves the Court to grant him an expansion of time to respond to the Government's Second Motion for Summary Judgment, and as grounds therefor says as follows:

1. Additional time is needed to contact Claimant who is currently in Mexico.
2. Claimant is also in need of additional time to locate documents that were lost in California during Claimant's incarceration.
3. Attorney for Claimant has no record of ever receiving the Order issued on August 16, 2007 (Doc. 56) through email notification ordering the Claimant to file a response to the Government's Second Motion for Summary Judgment.
4. Because of these circumstances, Claimant requests an additional fourteen (14) days to respond to the Government's motion.

s/Bruce Maddox
Bruce Maddox (MAD013)

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of September, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to appropriate parties.

s/Bruce Maddox
Of Counsel